

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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David E. Patton
Executive Director
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Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

October 6, 2022

BY ECF & E-MAIL

The Honorable Nelson S. Román
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Application DENIED. Deft. must satisfy ALL of the conditions. Clerk of Court is requested to terminate the motion at ECF No. 12.

Dated: White Plains, NY SO ORDERED:

Oct. 6, 2022

Re: *United States v. Ysenni Gomez*, 22-mj-6663
22cr526

Dear Honorable Judge Román:

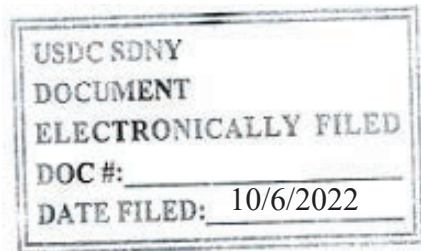
I write to respectfully request that you modify Ms. Gomez's bond conditions as specified below.

On September 8, 2022, at a bail review hearing, Your Honor ordered Ms. Gomez released only if certain conditions were met. Specifically, she was ordered released on a \$850,000 bond, with \$500,000 of that amount secured by cash or property, co-signed by 3 financially responsible people, 24/7 home detention with electronic monitoring, and she was required to surrender of her passport, amongst other conditions that would be in place upon her release.

Since that hearing, her family has worked diligently to meet the bond conditions. At present, her sister has posted \$370,000 cash and has demonstrated the source of those funds to the satisfaction of the government. In addition, her cousin has filed a lien on her home in Connecticut. We have provided documentation to the government demonstrating the lien, as well as mortgage documents and other documents requested regarding the home, which is valued at over \$200,000. Three financially responsible people have been vetted by the government and have co-signed the bond. Finally, I surrendered her passport to Pre-Trial Services earlier this week.

My understanding through conversations with the assigned Assistant United States Attorney Kaiya Arroyo is that the government would like additional documentation regarding the property being posted in Connecticut. We are working diligently to provide the requested materials. Part of the delay is in determining the unique filing requirements for Connecticut and the specific town where the property is located to ensure the lien is properly in place.

Given that Ms. Gomez has satisfied nearly all the conditions and that the additional information requested by the government is forthcoming, but may still take a few days to acquire, I respectfully request that the Court allow Ms. Gomez to be released once she has signed



[Signature]
HON. NELSON S. ROMÁN
UNITED STATES DISTRICT JUDGE

the bond and permit her 10 days to full satisfy the conditions regarding the property. I have conferred with Ms. Arroyo and the government does not oppose this request. It is my understanding that Ms. Arroyo has contacted the United States Marshals Service, and should Your Honor grant this request, Ms. Gomez can be produced to the courthouse tomorrow to be sworn to the bond and to meet with Pre-Trial Services to have the ankle monitor installed.

In light of all of this, Ms. Gomez respectfully requests Your Honor modify her conditions as described so that she may be released and have 10 days to full meet the terms of the bond.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth K. Quinn", with a stylized flourish at the end.

Elizabeth K. Quinn
Assistant Federal Defender
Counsel for Ysenni Gomez

cc: Kaiya Arroyo, AUSA